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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE:

NOBLE REY BREWING CO., LLC

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CASE NO 18-34214

RESPONSE TO MOTION TO LIFT STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Noble Rey Brewing Co., LLC. ("Debtor") in the above-styled and numbered cause, and files this its Response to Motion of JPMorgan Chase to Lift Stay ("Motion"), and in support thereof would respectfully show unto the Court as follows:

1. Debtor admits Movant is a creditor of the estate but denies the remaining allegations contained in paragraph 1 of the Motion.
2. Debtor admits the allegations contained in paragraph 2 of the Motion.
3. Debtor admits the allegations contained in paragraph 3 of the Motion.
4. Debtor admits the allegations contained in paragraph 4 of the Motion.
5. Debtor admits the allegations contained in paragraph 5 of the Motion.

6. Debtor admits the allegations contained in paragraph 6 of the Motion.
7. Debtor cannot admit or deny the allegations contained in paragraph 7 of the Motion.
8. Debtor admits the first sentence of paragraph 8 of the Motion, but denies the remainder of the paragraph.
9. Debtor denies the allegations contained in paragraph 9 of the Motion.
10. Debtor would show that the Court with the approval of Movant allowed for the sale of substantially all of the Debtor's assets and provided that Movant would receive \$200,000 from said sale on account of its secured claim. Therefore under the terms of the agreement between the parties the secured claim of Movant has been paid in full.

WHEREFORE, PREMISES CONSIDERED, Debtor, Noble Rey Brewing Co., LLC. respectfully pray this Honorable Court enter an denying the Motion and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

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BY: /s/ Eric Liepins
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to Richard Dafoe, 1601 Elm Street, Suite 4100, Dallas, Texas 75201 via United States mail on this the 22nd day of April 2019.

____/s/ Eric Liepins_____
Eric A. Liepins